

REMARKS

Claims 22 – 31 have been amended to recite a tangible, computer accessible medium rather than a carrier medium. No claims have been added or cancelled. Claims 1-31 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Applicants strongly object to the prosecution of the present application being reopened. As shown below, the newly cited art has little relevance to Applicants' claimed invention. Applicants request immediate allowance of the present application.

Section 102(e) Rejection:

The Examiner rejected claims 1, 5, 7-10, 13-16, 18-21, 26, 27 and 31 under 35 U.S.C. § 102(e) as being anticipated by Hamilton et al. (U.S. Patent 5,758,186) (hereinafter "Hamilton"). Applicants respectfully traverse this rejection for at least the reasons given below.

Regarding claim 1, contrary to the Examiner's assertion, Hamilton fails to disclose a client generating a request for type information for an attribute or event. Hamilton teaches a system for handling method calls in a client/server computer system to support various diverse protocols without requiring individual server stubs for each supported protocol (Hamilton, Abstract, column 1, line 56 – column 2, line 8 and column 4, lines 37 – 51). In Hamilton's system, protocol-dependent method descriptors from remote method calls are used to determine an equivalent protocol-independent method to execute the desired method. Hamilton fails to teach a client generating a request for type information for an attribute or event. The Examiner cites FIGs. 1 and 2, as well as column 2, line 58 to column 3, line 23 of Hamilton. However, none of the portions cited by the Examiner mention anything about a client generating a request for type information. Instead, FIG. 1 illustrates a client/server computer apparatus including a set

of client computers that communicate with a server computer over a transmission channel. FIG. 2 illustrates the various components involved in the processing of a method call according to Hamilton's system. The last cited portion of Hamilton (column 2, line 58 to column 3, line 23) describes, in general terms, how client stub objects on client computers receive procedure calls from applications "requesting the execution of specified methods of specified objects."

Nowhere does Hamilton teach anything regarding a client generating a request for type information for an attribute or event. Instead, Hamilton teaches only that client applications, via client stubs may request execution of methods on specified objects. The Examiner presumably considers disclosure of remote procedure calls implies requesting type information for an attribute or event. However, requesting the invocation of a method on a remote object is not the same as, nor does it imply, requesting type information for an attribute or event, as these concepts are understood in the art. Hamilton makes absolutely no reference at all to a client generating a request for type information for an attribute or event.

Additionally, contrary to the Examiner's contention, Hamilton does not disclose a metadata gateway receiving the request for type information from the object request broker. The Examiner cites column 3, line 36 – column 4, line 37, but fails to indicate what component(s) of Hamilton's system the Examiner considers to be a metadata gateway. The cited passage describes how the server processing a received remote procedure call by determining a protocol-independent method corresponding to the received protocol-dependent method call request. The cited passage does not describe anything regarding a metadata gateway receiving a request from type information from the object request broker. As illustrated by FIG. 2, a server stub receives an index value corresponding to a protocol-independent version of a requested method call from the ORB (according to Hamilton, the dashed rectangle 70 represents components associated with an ORB). Hamilton teaches that the server stub "makes a procedure call to execute a specified method of the invoked object" (Hamilton, column 3, lines 58-63). Thus, rather than disclosing a metadata gateway receiving a request for type

information from an ORB, Hamilton teaches that the ORB sends a request for a specific method invocation to a server stub that executes the requested method and returns any results.

Hamilton further fails to disclose reading the type information from a metadata repository, wherein the type information is stored in a database format in the metadata repository. The Examiner cites Remote Object Repository 106 of FIG. 5 and column 4, lines 38-65 and column 5, lines 9-58. However, the cited passages do not describe anything regarding Remote Object Repository 106, which the Examiner equates to a metadata repository. Instead, the cited passages describe how Hamilton's system determines a protocol-independent method from a received protocol-dependent method descriptor. Neither of the cited passages described or mentions reading type information from a metadata repository. Furthermore, the Remote Object Repository 106 is not a metadata repository from which type information is read. Instead, Hamilton describes, regarding FIG. 5, how his system performs exception handling (see, Hamilton, column 6, line 46 – column 7, line 35). Hamilton does not teach a client generating a request for type information for an attribute or event and reading the type information from Remote Object Repository 106, which the Examiner equates to a metadata repository. Instead, Hamilton teaches that a client may receive an exception list along with the results from an executed method call and how an exception may point to or indicate an object in either a local or remote object repository. Hamilton's client may instantiate the object with from the local object repository or may download the object from another computer (e.g. from Remote Object Repository 106). Thus, nowhere does Hamilton teach anything about reading type information from a metadata gateway, wherein the type information is stored in a database format in the metadata repository.

Hamilton also does not teach the metadata gateway sending the translated type information to the object request broker. The Examiner again relies upon column 4, lines 38-65 and column 5, lines 9-58 of Hamilton. However, these passages do not describe anything about a metadata gateway sending translated type information to an object request broker. Instead, as noted above, the cited passages describe how

Hamilton's system determines a protocol-independent method from a received protocol-dependent method descriptor. Nothing in Hamilton's system sends translated type information read from a metadata repository to an object request broker. Hamilton does not describe anything sending translated type information read from a metadata repository to an object request broker. The only thing send to an object request broker are remote procedure call requests from clients and the results of executing the requested methods, neither of which can be considered translated type information read from a metadata repository.

Furthermore, Hamilton fails to disclose a client receiving the translated type information for the attribute or event through the object request broker, wherein the translated type information is expressed in the interface definition language. The Examiner again cites column 4, lines 38-65 and column 5, lines 9-58. However, neither of these passages describes a client receiving translated type information for an attribute or event. Instead, as noted above, these passages describe how Hamilton's server determines protocol-independent methods corresponding to receive protocol-dependent method requests and how a server stub executes the requested method and returns the results to the client. While Hamilton's system does include translating method descriptors from and method results between protocols in order to support multiple protocols, Hamilton does not teach anything regarding requests for type information and clearly does not describe a client receiving translated type information for an attribute or event.

Applicants remind the Examiner that anticipation requires the presence in a single prior art reference disclosure of each and every limitation of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The identical invention must be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). As discussed above, Hamilton fails to disclose a client generating a request for type information for an attribute or event, a metadata gateway receiving the request for type information from an object request

broker, reading the type information from a metadata repository, and the client receiving translated type information for the attribute or event. Therefore, Hamilton clearly cannot be said to anticipate claim 1.

For at least the reasons given above, the rejection of claim 1 is not supported by the prior art and removal thereof is respectfully requested. Similar remarks as those above regarding claim 1 also apply to claim 22.

Regarding claim 8, Hamilton fails to disclose wherein the metadata gateway is distributed over a plurality of servers, wherein each of the plurality of servers presents a substantially identical view of the metadata gateway. The Examiner cites FIG. 5, column 3, line 36 – column 4, line 51 and column 5, line 46 – column 7, line 34, but fails to indicate which portion of Hamilton's system the Examiner considers a metadata gateway. However, none of the cited passages describes a metadata gateway distributed over a plurality of servers. FIG. 5 illustrates a data structure that may be used in practicing Hamilton's invention and "illustrates that the invention supports method calls and their associated exceptions" (Hamilton, column 2, lines 50-52 and column 6, lines 46 – 49). Nowhere does Hamilton describe a metadata gateway distributed over a plurality of servers. Hamilton only describes his system in conjunction with a single server computer (see, Hamilton, column 2, lines 58 – 65 and column 3 lines 36 – 47).

For at least the reasons above the rejection of claim 8 is not supported by the prior art and removal thereof is respectfully requested.

Regarding claim 10, Hamilton fails to disclose a client generating a request to encode type information or an object, attribute, or event, in contrast to the Examiner's contention. As noted above regarding claim 1, Hamilton teaches a system in which client send remote procedure calls to invoke specified methods of remote objects. Hamilton does not, however, mention anything regarding a client generating a request to encode type information for an object, attribute, or event. The Examiner cites column 2, line 58 – column 3, line 23. However, the cited passage makes no mention of a request to

encode type information for an object, attribute or event. Instead, as noted above regarding claim 1, the cited passage describes the various components, such as client computers, server computers, of Hamilton's system, but fails to mention anything about a client generating a request to encode type information for an object, attribute or event. The only requests generated by clients in Hamilton's system are requests for execution of specified methods of server objects (see, Hamilton, column 3, lines 36-47).

Hamilton also fails to disclose a metadata gateway receiving the request to encode the type information from the object request broker. The Examiner cites column 4, lines 38-65 and column 5, lines 9-58. However, as discussed above regarding claim 1, these passages do not describe anything regarding a metadata gateway and don't mention anything regarding a metadata gateway receiving a request to encode type information. Instead, as described above regarding claim 1, these passages describe how Hamilton's server determines protocol-independent methods corresponding to receive protocol-dependent method requests and how a server stub executes the requested method and returns the results to the client. Hamilton makes no mention of a metadata gateway receiving a request to encode type information.

Furthermore, Hamilton fails to disclose storing the type information in a metadata repository in database format. The Examiner relies upon the same passages cited above (column 4, lines 38-65 and column 5, lines 9-58). However, neither of these passages describes storing the type information in a metadata repository in database format. For details regarding what is taught by these two passages, please refer to the discussions above. Specifically, the Examiner equates Remote Object Repository 106 in FIG. 5 with a metadata repository. However, Hamilton does not teach anything about storing type information in Remote Object Repository 106. Instead, as described above regarding claim 1, Hamilton teaches that when a requested method is executed and generates an exception, the client may instantiate objects associated with an exception from either a local or remote object repository, such as Remote Object Repository 106. Nothing in Hamilton's system store type information in Remote Object Repository 106.

For at least the reasons presented above, the rejection of claim 10 is not supported by the prior art and removal thereof is respectfully requested. Similar remarks as those above regarding claim 10 apply to claim 27 as well.

Regarding claim 14, contrary to the Examiner's assertion, Hamilton fails to disclose a metadata repository comprising metadata concerning object classes for a plurality of managed objects, wherein the metadata comprises information expressed in a database format, and wherein the managed objects correspond to managed devices on a network. The Examiner equates Hamilton's Remote Object Repository 106 in FIG. 5 with a metadata repository. However, as discussed above regarding claims 1 and 10, Remote Object Repository 106 is used in conjunction with Hamilton's exception handling. Hamilton does not describe Remote Object Repository 106 as including metadata concerning object classes for a plurality of managed objects. In fact, Hamilton makes no reference whatsoever regarding managed objects. For more details regarding Remote Object Repository 106, please see the discussion above regarding claims 1 and 10. The Examiner also cites column 2, line 58 – column 3, line 23. However, this passage makes not reference whatsoever to Remote Object Repository 106. Nor does the cited passage describe any metadata repository including metadata concerning object classes for a plurality of managed objects.

Hamilton also fails to disclose a metadata gateway coupled to the metadata repository and to an object request broker, wherein the metadata gateway is operable to send and receive the metadata from the database and provide translation of the metadata to and from the database format and an interface definition language. The Examiner cites column 4, lines 38-65 and column 5, lines 9-58. The Examiner does not indicate what component of Hamilton's system the Examiner considers a metadata gateway. Neither of the two cited passages makes any reference to anything that can be considered a metadata gateway coupled to a metadata repository and an object request broker. Instead, the two passages describe various aspects of how Hamilton's system determines protocol-independent methods corresponding to received protocol-dependent method descriptors, as described in more details above regarding claims 1 and 10. Hamilton fails to describe

anything as coupled to Remote Object Repository 106, which the Examiner equates to a metadata repository. Nor does Hamilton describe anything that sends and receives metadata from Remote Object Repository 106.

Thus, for at least the reasons presented above, the rejection of claim 14 is not supported by the prior art and removal thereof is respectfully requested.

Regarding claim 15, Hamilton fails to disclose wherein the managed devices comprise a telephone system. The Examiner cites FIG. 5, column 3, line 36 – column 4, line 51 and column 6, line 46 to column 7, line 34. However, nowhere does Hamilton make any mention whatsoever about a telephone system. The portions of Hamilton cited by the Examiner include absolutely no mention of a telephone system. In fact, the cited references are completely irrelevant to a telephone system. A careful search of the Hamilton reference does not reveal a single reference to any sort of telephone system. The Examiner is request to specifically identify by column and line number exactly where Hamilton makes any mention or reference to any telephone system. The rejection of claim 15 is not supported by the prior art and removal thereof is respectfully requested.

Regarding claim 16, Hamilton fails to disclose wherein the managed devices comprise a network switch. The Examiner cites FIG. 5, column 3, line 36 – column 4, line 51 and column 6, line 46 to column 7, line 34. However, nowhere does Hamilton make any mention whatsoever about a network switch. The portions of Hamilton cited by the Examiner include absolutely no mention of a network switch. In fact, the cited references are completely irrelevant to a network switch. A careful search of the Hamilton reference does not reveal a single reference to any sort of network switch. The Examiner is request to specifically identify by column and line number exactly where Hamilton makes any mention or reference to any network switch. The rejection of claim 16 is not supported by the prior art and removal thereof is respectfully requested.

Section 103(a) Rejection:

The Office Action rejected claims 2-4, 6, 11, 12, 17, 23-25 and 28-30 under 35 U.S.C. § 103(a) as being unpatentable over Hamilton in view of Kulkarni et al. (U.S. Patent 5,848,243) (hereinafter "Kulkarni"). Applicants respectfully traverse this rejection for at least the reasons given above in regard to the rejection of the independent claims. Furthermore, Applicants refer to the Appeal Brief filed December 28, 2004 which points out numerous shortcomings in Kulkarni in regard to claims 2-4, 6, 11, 12, 17, 23-25 and 28-30. The Examiner has not addressed these distinctions.

Applicants also assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

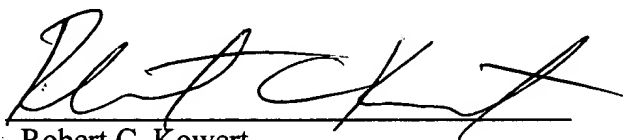
Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5181-46200/RCK.

Also enclosed herewith are the following items:

- ☒ Return Receipt Postcard
- ☐ Petition for Extension of Time
- ☐ Notice of Change of Address
- ☐ Fee Authorization Form authorizing a deposit account debit in the amount of \$
for fees ().
- ☐ Other:

Respectfully submitted,



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